

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

JOINT NOTICE OF SETTLEMENT IN PRINCIPLE BETWEEN
THE UNITED STATES OF AMERICA AND VALLEY LAND FUND, INC.

1. Pursuant to Local Rule 16.3, Plaintiff, the United States of America and Defendant, Valley Land Fund, Inc. (collectively, “the Parties”), file this joint notice of the Parties’ forthcoming settlement agreement.
 2. The Parties have reached a settlement in principle that, once finalized, will resolve this matter entirely.
 3. The Parties are in the process of finalizing revestment language that will require approval from U.S. Customs and Border Protection, the Department of Homeland Security, and the Department of Justice. The Parties are currently preparing the settlement paperwork to submit through this approval process.
 4. Upon finalizing the Parties’ settlement agreement, the Parties will file a joint stipulation of settlement and revestment, detailing the terms of the Parties’ agreement and requesting that the Court enter final judgment in accordance with those terms.

DEFENDANT:

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I, N. Joseph Unruh, Assistant United States Attorney for the Southern District of Texas, hereby certify that on September 17, 2021, a copy of the foregoing was served on all parties in accordance with the Federal Rules of Civil Procedure.

s/ N. Joseph Unruh
N. JOSEPH UNRUH
Assistant United States Attorney